



Solutia Inc.
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October 8, 1999

Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
• **October 1999 Monthly Report**

Dear Mr. McAteer,

Enclosed is the October 1999 Monthly Report for the Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

A handwritten signature in black ink, appearing to read "D. M. Light", written over a horizontal line.

D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc:

T. Gouger - USACE
C. Morin - IEPA
Mayor M. King - Cahokia
Sauget File - Solutia

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report: October 8, 1999
Period Covered: September 1 - September 30, 1999
Next Report Period: October 1, 1999 - October 31, 1999

Work Performed during the reporting period

- Contractors were mobilized to the Site on 9/7/99.
- Air samplers were assembled, calibrated and placed in the field 9/8 - 9/9. Air sampling was performed on 9/10 - 9/11.
- 9-15-99 & 9-16-99 - Perimeter trenching conducted on Site L. Site boundary defined.
- 9-16-99 - Menzie Cura performed reconnaissance survey of Dead Creek and the borrow area to identify reference locations. Reference locations were selected. Qualitative examinations of plants, invertebrates, and crayfish was conducted.
- Site G, H & L boundary trenching was completed.
- Located and evaluated existing monitoring wells.
- Began installing regional flow piezometers. Began taking groundwater level readings in existing wells and newly installed piezometers.
- Completed collection of waste borings on Site L. Collection of waste borings begun on Site H.

Work scheduled for next reporting period

- Task 4.0 - Source Area evaluations - Complete waste borings on Site H, G and I. Conduct fill area soil gas and magnetometry surveys. Begin fill area buried drum/tank identification trenching (Except I)¹.
- Task 6.0 - Creek Transect Evaluation - Begin layout of transects.
- Task 6.10 - Complete ecological soil sampling.
- Task 6.11 - Complete surface water sampling.
- Task 7.0 - Groundwater Evaluation - Complete piezometer installation and continue gw elevation monitoring. Complete residential well sampling. Complete upgradient GW sampling.

¹ Decision reached in a 9-30-99 meeting with EPA and Cerro Copper: Defer both the boundary trenching and the center trenching in Site I until the results of the magnetometry, soil gas, waste boring sampling (but not GW results) are completed. Access and need for trenching on Site I will be reevaluated after these results are in. Also, Solutia will add ground penetrating radar to the Site I investigative tools.

Problems and Solutions

- Boundary Trenching and Center Trenching on Site I will be delayed because of Cerro Copper's refusal to grant access (see Note 1). Final completion schedule may be delayed.
- Site N Boundary Trenching has been delayed because of difficulty in getting access. EPA assistance has resulted in access being granted to Solutia on October 7th. Schedule may be impacted.
- Rogers Cartage has been reluctant to grant access for the purpose of installing geoprobes. They have recently verbally indicated a willingness to agree but no formal agreement has yet been reached.
- The Village of Sauget will consider in a 10/12 Village meeting, whether to grant access to existing groundwater well EE20 for sampling purposes. This request is expected to be approved.
- Mobile has indicated verbal agreement to grant access to it's portion of Site N. We are following up with a reissue of the formal request.

Submittal Schedule Status (see attached)

- Attached schedule revised consistent with approved SSP.

Issues under review

- **Dead Creek Flooding** - No change in this report period.
A hydraulic study of Dead Creek has been completed. Preliminary results indicate that elimination of the restricted culverts will not appreciably affect the flooding conditions. A supplemental study was completed and submitted to the Agencies on July 30 for review.
- **UAO to address flooding** - U. S. EPA UAO - Docket No. V-W-99-C-554 - was issued to Solutia and received June 28, 1999. The UAO requires replacement of the culverts on Dead Creek to address flooding of Dead Creek. An alternative proposal to address the cause of the flooding and the contaminated sediments directly was made to U. S. EPA by Solutia July 8 at a conference in Cahokia. This proposal was formally submitted to U. S. EPA in Solutia's July 17, 1999 Response to the UAO. As committed to in the July 8 Cahokia conference and repeated in Solutia's July 17, 1999 Response, Solutia submitted to U.S. EPA in a July 30, 1999 correspondence, commitment to implement some additional short term plans to address the flooding and the sediments under the UAO. The Agency responded to Solutia's proposals in a September 24, 1999 letter received September 28, 1999. In summary, the Agencies approved replacement of the culverts at Cargill Road and the Terminal Railway ROW; requested a work plan for the proposed installation of facilities to pump water from Sector B to the American Bottoms Treatment plant; and agreed conceptually and requested additional discussions and information on the proposal to remove

contaminated sediments from Sector B and contain in an on-site double lined containment cell.

Comments

- Solutia has requested a meeting with Region V TSCA personnel for the purpose of discussing the technical requirements for the double lined containment cell for the Sector B sediments (See "UAO" discussion above).

January 21, 1999 Sauget Area I AOC

SCHEDULE
(10/99 Revision)

- | | |
|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Designation of Contractor | Completed 3/10/99 ² |
| 2. Designation of Other Contractors | 5 Business Days Before Start of Work |
| 3. Designation of Project Coordinator | Completed |
| 4. Submit Support Sampling Plan (SSP) | Submitted February 22, 1999 |
| 5. Submit Revised SSP | April 8, 1999 ³
June 25, 1999 ⁴
August 13, 1999 ⁵
September 9, 1999⁶ Approval |
| 6. Obtain Access Agreements | July 1, 1999 ⁷
September 17, 1999 ⁸
October 1, 1999 ⁹ |
| 7. Submit Health and Safety Plan (HASP) | Approved September 9, 1999 |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | Approved September 9, 1999 |

² Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

³ Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

⁴ April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25th as required.

⁵ June 25th SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

⁶ August 13, 1999 SSP submittal as revised August 30, 1999 and September 7, 1999 received final Agency approval on September 9, 1999.

⁷ Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

⁸ Access agreements update issued August 15, 1999 with request to extend deadline to September 17, 1999. Extensions to September 17, 1999 was granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

⁹ Access agreements update issued September 17, 1999 with request to extend deadline to October 1, 1999. Extensions to October 1, 1999 was granted by Mike McAteer in a September 21, 1999 e-mail to Mike Light

January 21, 1999 Sauget Area I AOC

SCHEDULE (Cont.)
(10/99 Revision)

9. Sampling Notification	10 Business Days Prior to Start of Work ¹⁰
10. Submit Data Report	01/09/01 ¹¹
11. Submit EE/CA Report	60 Calendar Days After Data Report Submittal - 03/09/99
12. Submit Revised EE/CA Report	21 Calendar Days After Receipt of EPA Comments
13. Submit RI/FS Report	90 Calendar Days After Data Report Submittal - 04/09/99
14. Submit Revised RI/FS Report	21 Calendar Days After Receipt of EPA Comments
15. Progress Reports	Monthly Beginning February 19, 1999 ¹²

¹⁰ Notification given on August 19, 1999 that Air Sampling will begin on September 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

¹¹ Per SSP - 16 mo. from SSP approval date of 9/9/99.

¹² Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work.